

DANIELLE M. HOLT
(Nevada Bar No. 13152)
DE CASTROVERDE LAW GROUP
1149 S Maryland Pkwy
Las Vegas, NV 89104
Ph (702) 222-9999
Fax (702) 383-8741
danielle@decastroverdelaw.com

JESSICA L. BLOME
(Cal. Bar No. 314898, pro hac vice application pending)
ALEXANDRA J. MONSON
(Cal. Bar No. 324794, pro hac vice application pending)
GREENFIRE LAW, PC
P.O. Box 8055
Berkeley, CA 94707
(510) 900-9502
jblome@greenfirelaw.com
amonson@greenfirelaw.com

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CANA FOUNDATION, a non-profit
corporation, LAURA LEIGH, individually,
and WILD HORSE EDUCATION, a non-
profit corporation,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
INTERIOR, BUREAU OF LAND
MANAGEMENT, and JON RABY, Nevada
State Director of the Bureau of Land
Management,

Defendants.

CASE NO. 2:22-cv-01200

DECLARATION OF LAURIE FORD

Complaint Filed: July 26, 2022
Hearing:

Laurie Ford

8/03/22

I am a contracted observation team member for Wild Horse Education (WHE)

I received both online and in-person training by Wild Horse Education (WHE) prior to attending Blue Wing.

I am a burro owner, rescuer and rehabilitator. I have owned burros for 35 years. I have deep abiding love and respect for burros.

I have prior experience attending burro roundup operations by the Bureau of Land Management. These roundups include operations in 2022. During the last operation I found a dead burro left on the range after it "injured spinal cord" and was euthanized on the range and left there. I remain concerned about the treatment of burros during capture.

I joined the WHE team in order to assure humane handling of wild horses and burros; with a particular interest in burros. That is why I asked to be the observer at Blue Wing.

I estimate the distance to trap at Blue Wing, due West of my location, at about 1.3 miles.

The first run of the first day, August 1, was an extremely large grouping of over 100 burros. I could not see any detail due to distance and obstruction by BLM trucks and stock trailers. It could have been as many as 150, I do not know.

BLM did not even provide, verbally, approximate numbers captured during the run. They did not even, verbally, communicate a single detail about capture.

Using a 500 mm prime lens, I could not clearly assess condition of burros. On enlargement, the images blur and I cannot assess detail. Using the 3000 mm video camera, I can see burros, but still have trouble assessing condition during capture. This equipment is used for extreme distance image capture and proved inadequate.

Using a 500 mm prime lens the trap pens were predominantly obstructed by trailers throughout loading of the burros to take them to temporary holding. The 500 mm lens was inadequate.

The 3000 mm at near full zoom creates a video that is poor quality. All I can document is an anecdotal statement that burros, including small ones, were captured and I was present.

I cannot note individuals or condition. I cannot even tell if the wranglers had roped a burro due to distance compounded by dust. I was entirely unable to document handling during loading due to obstructions.

Absolutely no detail could be seen with the naked eye.

I was prohibited from observing any handling or condition of burros after capture at the temporary holding corrals. I have been informed that we will not be allowed to visit the temporary corrals during this operation.

I fear this operation will end quickly without being able to assess condition at trap, handling during loading or condition at holding the temporary facility.

These burros will ship to tomorrow to an off-limits to the public short-term facility where I will not be able to see them.

View of trap with 500 mm lens.



View of drive with 500 mm. No detail can be discerned.



Screengrab of video with 3000 mm does not produce detail to assess condition beyond an anecdotal statement that a lot of burros were captured.



On the second day of the gather, August 2nd, I was told by BLM to observe from the same location, approximately 1.3 miles from the trap site. It was even harder to see the gather on the second day because of the distance compounded with the heat.

After being driven by a helicopter for an unknown distance, I could just barely make out a burro being roped. The burro struggled for over an hour. I could see the burro fall onto his side and flip over during the struggle. I was not allowed to view the burro from close enough to identify the animal or his tag to track him. I was not allowed to view the burro in holding. I was not able to get close enough to ever evaluate his condition after the struggle. I am concerned for his welfare.

From what I can tell, probably at least 8 burros have been roped by BLM during this gather.

Screengrabs of video with 3000 mm from August 2nd.





I intend to remain at the operation to document the removal and handling of wild horses from the Blue Wing Complex as a member of the WHE team.

I affirm that the foregoing is true to the best of my knowledge. If called to testify, I would do so competently and based on my personal knowledge of these events.

DATED this 3rd day of August, 2022.

/s/ Laurie Ford

Laure Ford